

REMARKS

Favorable reconsideration of this application, in light of the following discussion, is respectfully requested.

Claims 1-4, 7-10, and 13-32 are currently pending. No claims have been amended herewith.

In the outstanding Office Action, Claims 1, 7, 21, and 27 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,047,861 to Houchin et al. (hereinafter “the ‘861 patent”); Claims 2-4, 8-10, 22-24, 28, and 29 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the ‘861 patent in view of U.S. Patent No. 5,260,797 to Muraji et al. (hereinafter “the ‘797 patent”); Claims 25, 26, 31, and 32 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the ‘861 patent in view of Japanese Patent No. JP 11-113019 to Hideo (hereinafter “the ‘019 patent”); and Claims 13-20 were allowed.

Claim 1 is directed to an image display apparatus, comprising: (1) an image processor for outputting image data including plural color component data; (2) a gain corrector for correcting chromaticity levels of the image data output by the image processor; and (3) an image display device having pixels each emitting a plurality of colored light rays for forming a color image in accordance with the corrected image data corrected by the gain corrector. Further, Claim 1 recites that the gain corrector corrects a respective level of at least one of the plural color component data applied to each respective pixel in the image display device based on measured luminance levels at each respective pixel such that, when image data representing an image of a uniform color are output from the image processor, a difference in chromaticity of light exiting from the pixels due to characteristic differences between the pixels of the image display device is reduced.

The '861 patent is directed to an apparatus for correcting image data *detected by an image sensor* to correct for sensitivity variations of the sensor photosites and noise in the sensor and other electrical circuits. As shown in Figures 2 and 3, the image data values  $d_n$  read from the image sensor are corrected based on corresponding offset correction values  $O_n$  and gain values  $g_n$ . In particular, the '861 patent is directed to a method of efficiently storing look-up-table values to select between different correction curves for each pixel based on the value of  $O_n$ , as shown in Figures 9-13. Further, the '861 patent discloses that the correction curves are applied based on the offset correction value of  $O_n$  calculated for each pixel when the illumination of the image sensor 10 is extinguished, and that the gain  $g_n$  is determined by comparing the sensor output when the light source illumination level is set to a predetermined level to that of a preferred "white level" output.<sup>1</sup>

Initially, Applicants note that the '861 patent fails to specifically indicate that the '861 method is applicable to correcting chromaticity levels of image data that includes plural color component data. Rather, as the inputs in Figure 8 show, the '861 patent appears to be directed to gray-level values only.

Further, the '861 patent fails to disclose an image display device having pixels each emitting a plurality of colored light rays for forming a color image in accordance with the corrected image data corrected by the gain corrector, as recited in Claim 1. Moreover, contrary to the assertion in the Office Action, Applicants submit that it is not inherent in the '861 patent that "the corrected value is output to a display device."<sup>2</sup> Rather, the '861 patent is directed to correcting inconsistencies in an image sensor and does not discuss any aspects of displaying an image.

Further, Applicants note that the '861 patent fails to disclose a gain corrector that corrects a respective level of at least one of the plural color component data applied to each

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<sup>1</sup> See column 4 of the '861 patent.

<sup>2</sup> See Page 3 of the Office Action dated January 28, 2004.

respective pixel in the image display device based on measured luminance levels at each respective pixel of the display device, as recited in Claim 1. In this regard, Applicants note that since the '861 patent does not disclose a display device, it cannot disclose gain correction based on measured luminance levels of the display device.

Finally, Applicants submit that the '861 patent fails to disclose that plural color component data are corrected such that when image data representing an image of an image of a uniform color or output from the image processor, *a difference in chromaticity of light exiting from the pixels of the display device due to characteristic differences between the pixels of the image display device* is reduced. The '861 patent is silent as to whether its gain correction has anything to do with the characteristic differences between the pixels (that affect chromaticity) of an image display device. Moreover, as discussed above, Applicants note that the '861 patent does not discuss a display device. Accordingly, for the reasons stated above, Applicants respectfully traverse the rejection of Claim 1 as anticipated by the '861 patent.

Claim 7 cites limitations analogous to the limitations recited in Claim 1. Accordingly, for the reasons stated above for the patentability of Claim 1, Applicants respectfully traverse the rejection of Claim 7 as anticipated by the '861 patent.

Claims 21 and 27 recite limitations analogous to the limitations recited in Claim 1. However, Claims 21 and 27 do not recite that the gain correction is based on measured luminance levels at each respective pixel, as recited in Claim 1. However, Applicants note that Claims 21 and 27 each recite an image display device having pixels each emitting a plurality of colored light rays and that the gain correction is applied such that a difference in chromaticity of light exiting from the pixel due to characteristic differences between the pixels of the image display device is reduced. Accordingly, for the reasons stated above for

the patentability of Claim 1, Applicants respectfully traverse the rejection of Claims 21 and 27 as anticipated by the '861 patent.

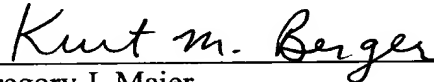
Regarding the rejection of dependent Claims 2-4, 8-10, 22-26, and 28-32 under 35 U.S.C. § 103, Applicants respectfully submit that the '797 and '019 patents fail to remedy the deficiencies of the '861 patent, as discussed above. Accordingly, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and the rejection of dependent Claims 2-4, 8-10, 22-26, and 28-32 should be withdrawn.

Thus, it is respectfully submitted that independent Claims 1, 7, 21, and 27 (and all associated dependent claims) patentably define over any proper combination of the '861, '797, and '019 patents.

Consequently, in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The present application is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,  
MAIER & NEUSTADT, P.C.



Gregory J. Maier  
Attorney of Record  
Registration No. 25,599  
Kurt M. Berger, Ph.D.  
Registration No. 51,461

Customer Number  
**22850**

Tel: (703) 413-3000  
Fax: (703) 413-2220  
(OSMMN 08/03)

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